

EXHIBIT D

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May 25, 2007

By e-mail

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In re Parmalat Securities Litigation, 04 md 1653 (LAK)

Dear Mark, Jamie and Bruce:

Would you please let us know by next Tuesday whether you would like to take expert depositions under Fed. R. Civ. P. 26(b)(4)(A) and (C) of Messrs. Lagro, Galea and Megna. If you do, we would like to lock in June 26 and 27 for Mr. Lagro's deposition. We will give you available dates for Messrs. Megna and Galea as soon as we have them, but expect they will be in mid- to late July. As before, the depositions will be in Italian.

Because they have already been extensively deposed, we would expect that they would not be asked the same questions they previously answered.

Our understanding is that a witness's travel to the U.S. for the sole purpose of testifying in a U.S. court proceeding does not subject the witness to jurisdiction there. *See, e.g., American Centennial Ins. Co. v. Handal*, 901 F. Supp. 892, 894 (D. N.J. 1995). We would therefore ask you to confirm that their attendance at expert depositions in New York does not subject them or PricewaterhouseCoopers S.p.A. to personal jurisdiction here. If you are not prepared to do so, we will obtain Judge Kaplan's guidance on the issue.

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All Counsel

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By the same token (and for the same reason), we would ask that you confirm that their signing the protective order is a consent to the jurisdiction of the court solely for purposes of enforcing the terms of the protective order, and does not otherwise subject them to jurisdiction.

Although your clients are the only parties that would have any right to take these depositions, we would also ask that, if any other party to the MDL proceedings disagrees with these propositions, it let us know by Tuesday as well.

Sincerely,



Loren Kieve

cc: all counsel (by e-mail)